

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V., and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-WMW-JFD

[PROPOSED] ORDER

Having considered Plaintiff's Motion to Compel (ECF No. 72) it is hereby ORDERED that the motion is GRANTED.

1. Defendants must provide amended responses to Request for Production ("RFP") Nos. 3, 4, 5, 6, 9, 11, 12, 13, 14, 15, 16, and 18 of Smartmatic's First Set of Requests for Production Directed to Defendants Michael J. Lindell and My Pillow, Inc. in which, pursuant to Federal Rule of Civil Procedure 34(b)(2)(C), they identify the portion of the RFP that they deem objectionable and will not comply with, if any, and agree to permit inspection of the remainder of the requested documents;

2. My Pillow, Inc. must provide amended responses to RFP Nos. 28 and 29 in Plaintiffs' Second Set of Requests for Production Directed to Defendant My Pillow, Inc., in which, pursuant to Federal Rule of Civil Procedure 34(b)(2)(C), it identifies the portion

of the RFP that it deems objectionable and will not comply with, if any, and agree to permit inspection of the remainder of the requested documents;

3. Defendants must produce all non-privileged documents in their possession, custody, or control that are responsive to RFP No. 1 of Smartmatic's First Set of Requests for Production Directed to Defendants Michael J. Lindell and My Pillow, Inc.;

4. Defendants must fully and completely answer Interrogatory Nos. 1, 9, and 15 of Smartmatic's First Set of Interrogatories Directed to Defendants Michael J. Lindell and My Pillow, Inc.; and

5. MyPillow must fully and completely answer Interrogatory Nos. 18, 19, and 22, of Smartmatic's Second Set of Interrogatories Directed to Defendant My Pillow, Inc.

SO ORDERED this ____ day of _____, 2023.

JOHN F. DOCHERTY
United States Magistrate Judge